

**Maryjane Kenney**

Selectmen's  
Business  
#7  
9/22/08

**From:** Jane Ceraso [Jane@actonwater.com]  
**Sent:** Friday, September 19, 2008 10:40 AM  
**To:** Andrew Magee; Doug Halley; Board of Selectmen  
**Cc:** Mary Michelman; Chris Allen; Stephen Anderson; breagor@concordma.gov; James Okun; Steve Ledoux; Chris Allen  
**Subject:** RE: W. R. Grace (Acton Plant) Superfund site - Town Comments

Hi All: Since I can't attend the Monday night meeting I'd like to put an FYI in here. The AWD has been in the loop on the 1,4 dioxane detection, and for the past 2 years has been conducting regular monitoring for this unregulated compound at all Assabet and School Street wells. We use a lab that can detect a PQL of 0.2 ug/L and also have them flag any detections between the PQL and MDL. We have pretty consistently seen levels in most of these wells around 0.2 ug/L or just below.

We agree that proper and more timely notification should have been provided for the 1,4 dioxane detection at AR-30D. Grace did call me to discuss their monitoring follow-up to the AR-30D detection, and agreed to use the same lab we use and the same (extremely low) PQL in their follow up investigations.

Jane Ceraso  
Environmental Manager  
Acton Water District  
PO Box 953  
Acton, MA. 01720  
phone: 978-263-9107  
fax: 978-264-0148  
www.actonh2o.com

-----Original Message-----

From: Magee, Andy [mailto:amagee@Epsilonassociates.com]  
Sent: Friday, September 19, 2008 8:59 AM  
To: Doug Halley; Board of Selectmen  
Cc: Mary Michelman; Chris Allen; Stephen Anderson; Jane Ceraso; breagor@concordma.gov; James Okun; Steve Ledoux  
Subject: RE: W. R. Grace (Acton Plant) Superfund site - Town Comments

Agreed.

Lauren:

I'd like to discuss this Monday night.

Thanks,

-Andy

-----Original Message-----

From: Doug Halley [mailto:dhalley@acton-ma.gov]  
Sent: Friday, September 19, 2008 8:17 AM  
To: Board of Selectmen  
Cc: Mary Michelman; Chris Allen; Stephen Anderson; Jane Ceraso; 'breagor@concordma.gov'; 'James Okun'; Steve Ledoux  
Subject: RE: W. R. Grace (Acton Plant) Superfund site - Town Comments

Mr. Golden is correct that in 2006 a notification was made regarding the presence of 1,4 Dioxane in monitoring wells ELF, LF-06C, LF-06N, LF-19SBR, MLF, WLF, MW-06B, MW-06D, MW-07B and MW-07D. It should be noted that this notification was given within four months of the sample date. As noted in the Selectmen's current comment letter awareness of 1,4 Dioxane in AR-30D did not come until the monitoring report of 2007 was received in August of 2008. EPA did not send out a notification letter as they did in 2006 despite the fact that the latest monitoring well with 1,4 Dioxane is directly adjacent to the Christofferson well.

Mr. Golden's response below illustrates the difference in approach between 2006 and 2008. It is reasonable for the Town, Water District and ACES to expect the same type of notification received now as was done in 2006.

-----Original Message-----

From: Golden.Derrick@epamail.epa.gov

[mailto:Golden.Derrick@epamail.epa.gov]

Sent: Wednesday, September 17, 2008 5:04 PM

To: Board of Selectmen

Cc: 'Jennifer.McSweeney@State.ma.us'; Mary Michelman; Chris Allen; Stephen Anderson; Jane Ceraso; 'breagor@concordma.gov'; 'okung@oto-env.com'; Doug Halley; Steve Ledoux

Subject: Re: W. R. Grace (Acton Plant) Superfund site - Town Comments

Dear Ms. Lauren Rosenzweig,

On September 12, 2008, EPA and MassDEP received, via e-mail, the attached comments dated September 22, 2008, from the Town of Acton on the 2007 Annual Groundwater Monitoring Report for the W. R. Grace site.

Thank you for providing EPA & MassDEP with these comments so that we may consider them for inclusion with our final comments to Grace.

The Town expressed concern about the detection of 1,4 Dioxane in the Northeast area as well as a concern that the Town was not notified about the detection of 1,4 Dioxane until August 2008. I would like to clarify that on 09/12/06, two years ago, EPA and MassDEP notified the Acton Water District, the Town of Acton and ACES concerning the detection of 1,4 Dioxane in the Northeast Area. For your files, I have attached the 9/12/06 Dioxane notification letter to this e-mail.

(See attached file: WR Grace 9\_2006 1,4 dioxane results.pdf) (See attached file: WR Grace Town cmmt on 2007 GW mon report 9\_2008.pdf)

Sincerely

Derrick Scott Golden

Remedial Project Manager

United States Environmental Protection Agency Office of Site Remediation & Restoration

Region 1 - New England One Congress Street, Suite 1100

(HBO) Boston, MA 02114-2023

Tel: 617-918-1448

Fax: 617-918-0448

e-mail: golden.derrick@epa.gov

**Maryjane Kenney**

*BOS Mail  
9/19/08*

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**From:** Mary Michelman [msmichelman@comcast.net]  
**Sent:** Monday, September 15, 2008 4:03 PM  
**To:** Golden.Derrick@epamail.epa.gov; 'McWeeney, Jennifer (DEP)'  
**Cc:** Board of Selectmen; Chris Allen; Stephen Anderson; 'Jane Ceraso'; Doug Halley; Steve Ledoux; okun@oto-env.com; breagor@concordma.gov; Barb.Weir@m-e.aecom.com; White.Sarah@epamail.epa.gov  
**Subject:** ACES Comments, 2007 Monitoring Program Report, WR Grace Site  
**Attachments:** Monitoring Prgrm Rpt 2007WR Grace ACES Comments Sept 15 2008.doc

Hi Derrick and Jennifer,

Please find attached ACES comments on the 2007 Monitoring Program Report for the WR Grace Site. Thank you for the opportunity to provide these comments.

Mary

9/15/2008

# ACES Acton Citizens for Environmental Safety

September 15, 2008

Mr. Derrick Golden, EPA Remedial Project Manager  
US Environmental Protection Agency  
EPA Region 1, Suite 1100  
1 Congress Street  
Boston, MA 02114-2023

Ms. Jennifer McWeeney, DEP Project Manager  
Bureau of Waste Site Cleanup  
MA Department of Environmental Protection  
One Winter Street  
Boston, MA 02108

Re: Monitoring Program Report, 2007  
WR Grace Superfund Site, Acton, Massachusetts  
Report prepared by GeoTrans  
Dated: July 31, 2008

Dear Mr. Golden and Ms. McWeeney,

Thank you for the opportunity to provide these comments, on behalf of ACES, on the 2007 Monitoring Program Report for the WR Grace Superfund Site in Acton. As requested, I am sending you ACES comments by September 15, 2008.

Comments:

## **1. Notification of AWD (p.3-14 to 3-15; Table 3-6)**

It is ACES understanding that the Acton Water District, (as well as the Town of Acton and ACES), learned of the 1,4-dioxane detections in the Northeast Area for the first time by reading the just released 2007 WR Grace Monitoring Report in August 2008. The well with the highest detection in the Northeast Area, AR-30D, is located adjacent to the Christofferson public well.

Please notify the Acton Water District as soon as possible whenever there is any detection that may be of concern to them. Whether it is 1,4-dioxane or some other contaminant that is close by one of the public wells or further upgradient of it, please notify the AWD as soon as possible so that they may perform their own additional sampling or take any other appropriate steps to protect the water supply. According to the report, 1,4-dioxane monitoring was done in September of 2007. Even given the time necessary for data validation, the AWD should have been given some advance notice of the detection, and not have had to learn about it for the first time by reading the monitoring report in August 2008.

## **2. 1,4 Dioxane (p.3-14 to 3-15; Table 3-6)**

The current report states: "Due to the detection of 1,4-dioxane at 4.4ug/L adjacent to the Christofferson Public Water Supply well, Grace proposes to collect additional 1,4-dioxane groundwater samples during the 2008 groundwater sampling round."

Thank you for adding 1,4-dioxane sampling to AR-31S, AR-31D, PS-22B and PS-29B in the 2008 sampling round. Please notify the Acton stakeholders, especially the AWD, as soon as possible with the 2008 results and continue this sampling in future annual monitoring rounds.

### **3. Include new MW-06 wells in annual sampling**

Please include the new Northeast Area monitoring wells MW-06D1 and MW-06D2 in the 2008 and subsequent annual monitoring rounds.

Please consider:

#### **Baseline data**

It is important to establish a baseline dataset for MW-06D1 and MW-06D2. These wells are ideally located to detect past, current, or future migration of contaminants to, from or within shallower depths in this part of the Northeast Area. The highest contaminant concentrations currently found at depth in the Northeast Area are in the vicinity of MW-06. Given that future groundwater extraction wells are likely to be sited nearby, it is prudent to begin sampling the new MW-06 wells on a regular basis as soon as possible to establish this baseline dataset. This is especially relevant given the recent concerns expressed by WR Grace about the potential movement of contaminants due to pumping effects from future extraction wells, (Northeast Area Groundwater Pre-Design Results Report, May 5, 2008.)

#### **Sentinel well—other contaminants**

While VDC, benzene and vinyl chloride were not detected on 12/21/07 at MW-06D1 and MW-06D2, other contaminants that could be of concern to the Acton Water District were detected.

These include 2-Butanone, acetone, chloroform, MTBE and TCE at MW-06D1; and 2-Butanone, acetone, and MTBE at MW-06D2. Monitoring MW-06D1 and MW-06D2 could provide the added benefit of providing valuable information for the Acton Water District.

#### **No conventional sampling done, only PDB sampling?—underestimates MTBE?**

The current report shows only passive diffusive bag, (PDB), sampling for MW-06D1 and MW-06D2 on 12/21/07. Are any additional VOC data available for these wells, including data collected using conventional sampling methods? One of the limitations of PDB samplers is that they underestimate concentrations of MTBE and 1,4-Dioxane. Even so, MTBE was detected at both of these wells. Please also sample MW-06D1 and MW-06D2 with conventional sampling methods.

The appropriateness of using the PDB sampling method is still under evaluation at the site. At other monitoring wells with a monitoring history using conventional methods, new PDB results are being compared with these historical results. Since MW-06D1 and MW-06D2 are both new wells without an extensive sampling history there is no conventional dataset to compare to PDB data in order to assess whether or not the results are accurate for this sampling location. It is premature to base a decision to discontinue monitoring at these new wells based on the results of one monitoring round using a sampling method that is still under evaluation.

### **4. Nickel, (p. 3-12 to 3-13);**

Please investigate the detections of nickel at the WR Grace Site, especially in close proximity to the Acton Water District public drinking water wells. The relevant standard for nickel is 100ppb. Elevated levels of nickel have been detected in the past at monitoring well AR-29SBR located very close to the Lawsbrook public well (360ppb in 2002; 214ppb in 2003; 272 in 2006; lower

concentrations were detected in other years). The Lawsbrook well is located slightly to the northeast of AR-29SBR.

The current report shows an elevated level of nickel at a different well, also in close proximity to the Lawsbrook well. 102ppb of nickel was detected in 2007 at monitoring well AR-31S. This well is located between the Lawsbrook and Scribner public wells/wellfields. There appears to be an increasing trend in nickel concentrations in AR-31S since 2002. The report cited sampling issues as a potential cause of the high detection in 2007. Please take whatever steps are necessary to further investigate the high nickel detections.

Concentration of Nickel in AR-31S (parts per billion)

| Sampling Date | Nickel concentration (ppb) |
|---------------|----------------------------|
| 9/20/07       | 102                        |
| 10/25/06      | 62                         |
| 9/23/05       | 43.4                       |
| 9/20/04       | 10.2                       |
| 9/15/03       | 2.6B                       |

**5. Monitoring Plan Release Date:**

Please release the 2008 Monitoring Plan Report and subsequent year reports earlier in the year to provide more time for the review of the previous year's results before the start of the next round of annual sampling. This will allow for sufficient time for review and any recommended changes before the next sampling round begins. With mailing time, the current report, dated July 31, 2008, was not available until August 2008. According to this July's Monthly Update for the site, the 2008 annual sampling round was due to begin in late August, or in September.

Thank you again for the opportunity to provide these ACES comments on the Monitoring Program Report, 2007 for the WR Grace Superfund Site in Acton.

Sincerely,

Mary Michelman  
ACES President

cc: Acton Board of Selectmen  
Chris Allen, AWD  
Stephen Anderson, Anderson & Kreiger  
Jane Ceraso, AWD  
Doug Halley, Acton Health Director  
Steve Ledoux, Acton Town Manager  
Jim Okun, OT&O  
Brent Reagor, Concord Health Director  
Barbara Weir, M&E  
Sarah White, USEPA

## Maryjane Kenney

---

**From:** Doug Halley  
**Sent:** Friday, September 19, 2008 8:17 AM  
**To:** Board of Selectmen  
**Cc:** Mary Michelman; Chris Allen; Stephen Anderson; Jane Ceraso; 'breagor@concordma.gov'; 'James Okun'; Steve Ledoux  
**Subject:** RE: W. R. Grace (Acton Plant) Superfund site - Town Comments

Mr. Golden is correct that in 2006 a notification was made regarding the presence of 1,4 Dioxane in monitoring wells ELF, LF-06C, LF-06N, LF-19SBR, MLF, WLF, MW-06B, MW-06D, MW-07B and MW-07D. It should be noted that this notification was given within four months of the sample date. As noted in the Selectmen's current comment letter awareness of 1,4 Dioxane in AR-30D did not come until the monitoring report of 2007 was received in August of 2008. EPA did not send out a notification letter as they did in 2006 despite the fact that the latest monitoring well with 1,4 Dioxane is directly adjacent to the Christofferson well. Mr. Golden's response below illustrates the difference in approach between 2006 and 2008. It is reasonable for the Town, Water District and ACES to expect the same type of notification received now as was done in 2006.

-----Original Message-----

From: Golden.Derrick@epamail.epa.gov [mailto:Golden.Derrick@epamail.epa.gov]  
Sent: Wednesday, September 17, 2008 5:04 PM  
To: Board of Selectmen  
Cc: 'Jennifer.McSweeney@State.ma.us'; Mary Michelman; Chris Allen; Stephen Anderson; Jane Ceraso; 'breagor@concordma.gov'; 'okung@oto-env.com'; Doug Halley; Steve Ledoux  
Subject: Re: W. R. Grace (Acton Plant) Superfund site - Town Comments

Dear Ms. Lauren Rosenzweig,

On September 12, 2008, EPA and MassDEP received, via e-mail, the attached comments dated September 22, 2008, from the Town of Acton on the 2007 Annual Groundwater Monitoring Report for the W. R. Grace site.

Thank you for providing EPA & MassDEP with these comments so that we may consider them for inclusion with our final comments to Grace.

The Town expressed concern about the detection of 1,4 Dioxane in the Northeast area as well as a concern that the Town was not notified about the detection of 1,4 Dioxane until August 2008. I would like to clarify that on 09/12/06, two years ago, EPA and MassDEP notified the Acton Water District, the Town of Acton and ACES concerning the detection of 1,4 Dioxane in the Northeast Area. For your files, I have attached the 9/12/06 Dioxane notification letter to this e-mail.

(See attached file: WR Grace 9\_2006 1,4 dioxane results.pdf) (See attached file: WR Grace Town cmmt on 2007 GW mon report 9\_2008.pdf)

Sincerely

Derrick Scott Golden  
Remedial Project Manager  
United States Environmental Protection Agency  
Office of Site Remediation & Restoration  
Region 1 - New England  
One Congress Street, Suite 1100 (HBO)  
Boston, MA 02114-2023

Tel: 617-918-1448

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e-mail: [golden.derrick@epa.gov](mailto:golden.derrick@epa.gov)





SDMS DocID

259648

**Superfund Records Center**SITE: W.R. GraceBREAK: G.IOTHER: 259648

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
NEW ENGLAND - REGION 1  
ONE CONGRESS STREET SUITE 1100  
BOSTON MASSACHUSETTS 02114-2023

September 12, 2006

Mr. Jim Deming  
District Manager  
Water Supply District of Acton  
693 Massachusetts Avenue  
P.O. Box 953  
Acton, MA 01720-0953

Re: Recent 1, 4-Dioxane Groundwater Results from the W. R. Grace (Acton Plant) Superfund (site)  
located in Acton and Concord, MA.

Dear Mr. Deming:

The U.S. Environmental Protection Agency (EPA) and the Massachusetts Department of Environmental Protection (MassDEP) both received a letter dated August 9, 2006 from GeoTrans, Inc., concerning the W. R. Grace Superfund site in Acton Massachusetts. As you may know, GeoTrans has been performing environmental consulting services at the site on behalf of W. R. Grace & Co. for some time now.

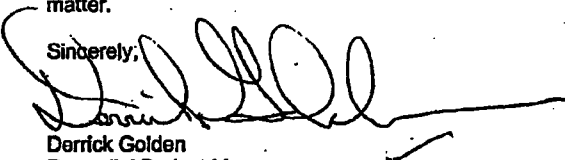
In anticipation of the upcoming remedial design for the new groundwater treatment system at the site, W. R. Grace directed GeoTrans to collect groundwater samples from ten locations near where groundwater extraction is expected to occur, i.e. the landfill and Northeast areas. Samples from these wells were analyzed for 1,4-dioxane, arsenic, chromium, iron, lead, manganese and nickel. The analytical results and sampling locations from the August 9, 2006 memo are included with this letter. The 1,4-dioxane results ranged from non-detect (2 µg/L was the detection limit) to a maximum of 36 µg/L in landfill well # LF-06C. MassDEP has proposed a drinking water standard of 3.0 µg/L for 1,4-dioxane.

A copy of the August 9, 2006, sampling results was forwarded to Mr. Paul Anderson at the MassDEP Water Supply, Bureau of Resource Protection, located in the Central Region for their evaluation.

Also, both EPA and MassDEP (Bureau of Solid Waste) have been reviewing this data and are evaluating possible outcomes including the requirement to have W. R. Grace analyze for 1, 4-dioxane as part of future groundwater monitoring activities

If you have questions or require additional clarification, please contact myself or Dan Keefe regarding this matter.

Sincerely,

  
Derrick Golden  
Remedial Project Manager  
Office of Remediation and Restoration  
Environmental Protection Agency

cc: Gretchen Muench, EPA  
Dan Keefe, MassDEP  
Maryellen Johns, W. R. Grace  
Doug Hailey, Acton Board of Health  
Paul Anderson, MassDEP  
Paula Caron, MassDEP  
Mary Michleman, ACES



6 Lancaster County Road  
Harvard, MA 01451

www.geotransinc.com

978-772-7557 FAX 978-772-6183

P.N. 3008.023.08

August 9, 2006

Mr. Derrick Golden  
Waste Management Division  
U.S. Environmental Protection Agency  
Region I  
1 Congress Street, Suite 1100  
Boston, MA 02114-2023

Mr. Daniel Keefe  
Bureau of Waste Site Cleanup  
MA Department of Environmental  
Protection  
One Winter Street  
Boston, MA 02108

**RE: May 2006 BOC Gases and Landfill Area Groundwater Sampling Results,  
W. R. Grace Superfund Site, Acton, Massachusetts**

Gentlemen:

This letter presents the analytical results of groundwater samples that were collected from ten locations near where groundwater extraction is expected to occur as part of the final Site remedy. This sampling was done to support the design of the groundwater treatment system.

Groundwater samples were collected from ten wells on May 23-24, 2006, six wells in the area south of the Industrial Landfill and four wells at BOC Gases. The samples were analyzed for 1,4-dioxane, total and dissolved arsenic, chromium, iron, lead, manganese and nickel, and total phosphorus. The following wells were sampled: unconsolidated deposits extraction wells ELF, MLF, and WLF; unconsolidated deposits monitoring wells LF-06C, MW-06D, and MW-07D; and bedrock wells LF-19SBR, LF-06N, MW-06B, and MW-07B. The analytical results are presented in Tables 1 and 2.

If you have any questions regarding this letter please call me at (978)-772-7557.

Sincerely,

*for* Anne Benjamin Sheehan  
Project Manager

Attachment

cc: Dave Fuerst, O&M, Inc.  
Jack Guswa, JG Environmental  
Maryellen Johns, Remedium  
Mitch Obradovic, Remedium  
Barbara Weir, Metcalf & Eddy

ABS/gsk

Table 1. Analytical Results from Groundwater Samples, Landfill Area.

| LOCATION         | ELF        | LF-06C     | LF-06N     | LF-19SBR   | LF-19SBR   | MLF       | WLF       |
|------------------|------------|------------|------------|------------|------------|-----------|-----------|
| Sample_date      | 5/23/06    | 5/23/06    | 5/23/06    | 5/23/06    | 5/23/06    | 5/23/06   | 5/23/06   |
| QA_type          | N          | N          | N          | DUP        | N          | N         | N         |
| Parameter        |            |            |            |            |            |           |           |
| 1,4-Dioxane      | 6.6        | 36         | 27         | 13         | 12         | 1.2 J     | 2.3       |
| Total Phosphorus | 180        | 744        | 84.9       | ND (50)    | ND (50)    | ND (50)   | 56.9      |
| Total            |            |            |            |            |            |           |           |
| Arsenic          | 89.9       | 892        | 15.7       | 1.6        | 1.8 B      | 48.1      | 38.1      |
| Chromium         | ND (2.01)  | ND (2.01)  | ND (2.01)  | ND (2.01)  | ND (2.01)  | ND (2.01) | ND (2.01) |
| Iron             | 15500      | 56600      | 13500      | 2710       | 2710       | 18500     | 5940      |
| Lead             | 0.192 B    | 0.102 B    | 0.069 B    | ND (0.052) | ND (0.052) | 0.948 B   | 0.114 B   |
| Manganese        | 3090       | 6680       | 614        | 309        | 312        | 5770      | 1640      |
| Nickel           | 6.9        | 12.5       | 5.2        | 1.7        | 1.3 B      | 19.7      | 7.9       |
| Dissolved        |            |            |            |            |            |           |           |
| Arsenic          | 27.1       | 82.2       | 8.1        | 1.1 B      | 0.929 B    | 25.3      | 27.6      |
| Chromium         | ND (2.01)  | ND (2.01)  | ND (2.01)  | ND (2.01)  | ND (2.01)  | 2.6 B     | ND (2.01) |
| Iron             | 5150       | 4810       | 8070       | 168        | 152        | 14200     | 3160      |
| Lead             | ND (0.052) | ND (0.052) | ND (0.052) | ND (0.052) | ND (0.052) | 0.154 B   | 0.077 B   |
| Manganese        | 2990       | 19.6       | 629        | 298        | 306        | 5680      | 1630      |
| Nickel           | 6.6        | 0.073 B    | 5.1        | 1.9 B      | 1.8        | 20.4      | 7.8       |

NOTES:

Concentrations in µg/L

DUP - Duplicate Sample

ND (50) - Compound not detected at limit indicated in parentheses.

J - Estimate Value

B - Estimated Value

Table 2. Analytical Results from Groundwater Samples, BOC Gases.

| LOCATION         | MW-06B    | MW-06D     | MW-07B     | MW-07D     |
|------------------|-----------|------------|------------|------------|
| Sample_date      | 5/24/06   | 5/24/06    | 5/24/06    | 5/24/06    |
| QA_type          | N         | N          | N          | N          |
| Parameter        |           |            |            |            |
| 1,4-Dioxane      | 0.98 J    | 0.2 J      | 3.7        | 0.22 J     |
| Total Phosphorus | 167       | ND (50)    | 131        | ND (50)    |
| Total            |           |            |            |            |
| Arsenic          | 20.8      | 1.2 B      | 37.8       | 0.377 B    |
| Chromium         | ND (2.01) | ND (2.01)  | ND (2.01)  | ND (2.01)  |
| Iron             | 149       | 451        | 204        | 30.6 B     |
| Lead             | 0.617 B   | 0.263 B    | ND (0.052) | ND (0.052) |
| Manganese        | 202       | 5.9        | 178        | 4.8 B      |
| Nickel           | 0.56 B    | 1.1 B      | 2.6 B      | 3          |
| Dissolved        |           |            |            |            |
| Arsenic          | 18.2      | 0.436 B    | 33.8       | 0.372 B    |
| Chromium         | ND (2.01) | ND (2.01)  | ND (2.01)  | 2.4 B      |
| Iron             | 46.3 B    | ND (13.1)  | 33.1 B     | ND (13.1)  |
| Lead             | 0.398 B   | ND (0.052) | ND (0.052) | ND (0.052) |
| Manganese        | 201       | ND (1.12)  | 174        | 3.6 B      |
| Nickel           | 0.814 B   | 1.4        | 2.7        | 3.1        |

NOTES:

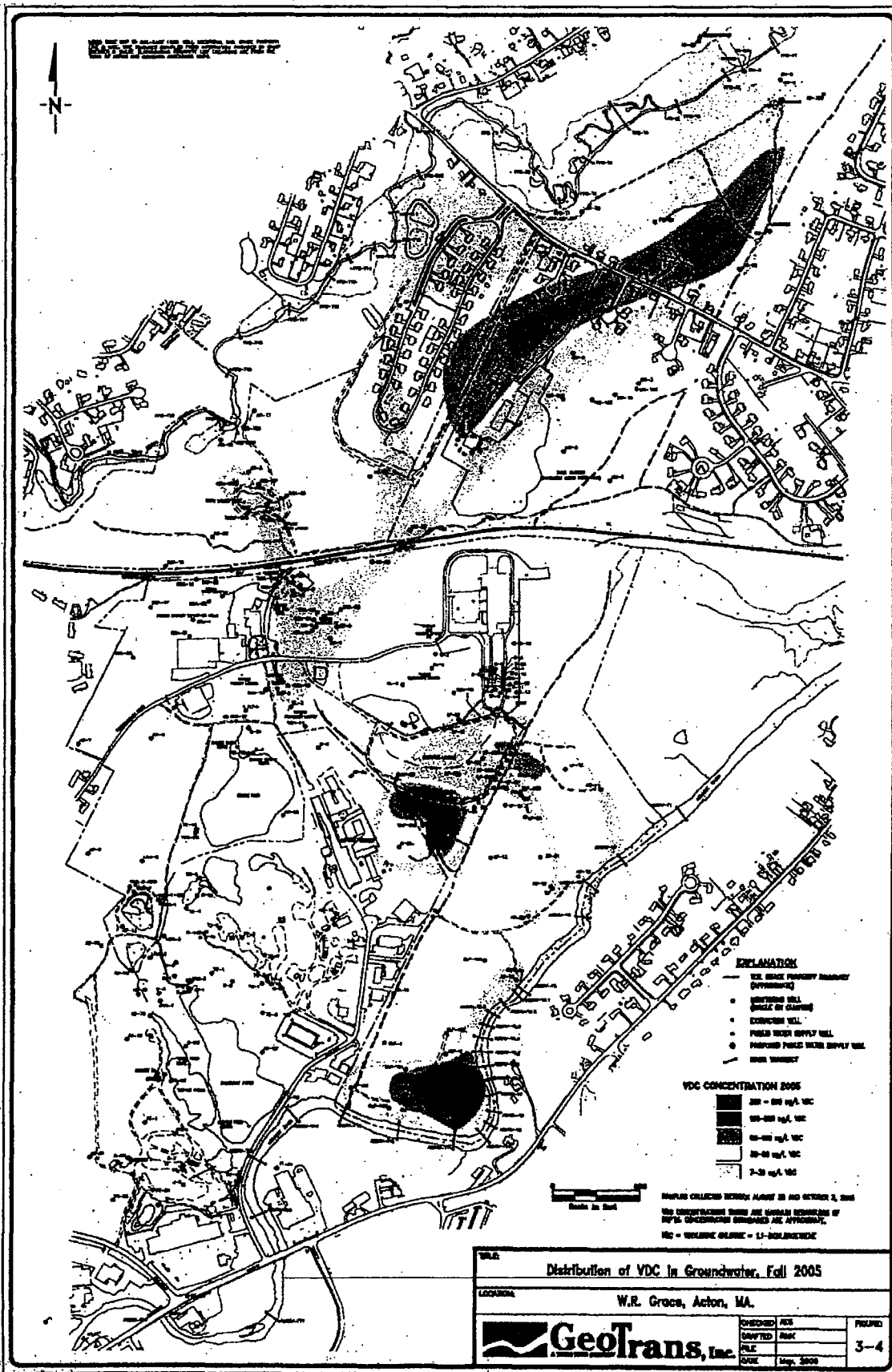
Concentrations in µg/L

DUP - Duplicate Sample

ND (50) - Compound not detected at limit indicated in parentheses.

J - Estimate Value

B - Estimated Value



|                                                        |         |      |              |
|--------------------------------------------------------|---------|------|--------------|
| TITLE<br>Distribution of VOC in Groundwater, Fall 2005 |         |      |              |
| LOCATION<br>W.R. Grace, Acton, MA.                     |         |      |              |
|                                                        | CHECKED | REV  | FILED<br>3-4 |
|                                                        | DATE    | DATE |              |
|                                                        | DATE    | DATE |              |



**TOWN OF ACTON**  
472 Main Street  
Acton, Massachusetts, 01720  
Telephone (978) 264-9612  
Fax (978) 264-9630

**Board of Selectmen**  
**Lauren Rosenzweig, Chairperson**

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September 22, 2008

Mr. Derrick Golden  
Waste Management Division  
U.S. Environmental Protection Agency  
Region 1  
1 Congress Street, Suite 1100  
Boston, MA 02114-2023

Ms. Jennifer McWeeney  
Bureau of Waste Site Cleanup  
MA Department of Environmental Protection  
One Winter Street  
Boston, MA 02108

Subject: Comments on Monitoring Program Report, 2007  
W.R. Grace Superfund Site, Acton, Massachusetts  
Report prepared by GeoTrans  
Dated: July 31, 2008

Gentlemen:

The Acton Board of Selectmen (Board) have reviewed the W. R. Grace Superfund Site Monitoring Program Report for 2007, dated July 31, 2008. That review raised concerns regarding the 1,4-dioxane detections in the Northeast Area. Although those detections were from sampling of monitoring wells completed in 2007, the Acton Water District (the "AWD"), Board and Acton Citizens for Environmental Safety (ACES) first learned of their presence by reading the just released 2007 WR Grace Monitoring Report in August 2008.

This is of a particular concern because the monitoring well with the highest detection in the Northeast Area, AR-30D, is located adjacent to the AWD's Christofferson public well. As you are no doubt aware, 1, 4-dioxane is of particular concern in water supply situations due to its toxicity, low rate of natural degradation and potentially rapid movement in aquifer systems. In addition, there are currently no treatment processes on the Water District's drinking water supply wells capable of removing 1,4-dioxane from raw water.

Due to these concerns the Board requests that the Acton Health Department and the AWD be notified within forty-eight (48) hours whenever there is a detection of any contaminant of concern that is different in location or concentration than what has been previously reported. Any contaminant of concern in close proximity to any of the public wells, or that is up-gradient of our wells, is obviously of particular concern. Immediate notification of the AWD and the Health Department will allow the opportunity to perform additional sampling or take any other appropriate steps to protect the water supply.

In addition, the Board agrees with W. R. Grace's addition of 1,4-dioxane sampling to monitoring wells AR-31S, AR-31D, PS-22B and PS-29B in the 2008 sampling round. However, the Board would again request that the Town Board of Health and the AWD be notified as soon as possible with the 2008 results for these particular wells so that a timely assessment can be made of any observed contaminant levels. The Board also requests that sampling of these monitoring wells continue in future annual monitoring rounds.

With the installation of the new Northeast Area monitoring wells MW-06D1 and MW-06D2 the Board requests that they be included the 2008 and subsequent annual monitoring rounds. The Board believes it is important to establish a baseline dataset for these monitoring wells. Their locations offer significant benefits for understanding the past and potential future migration of contaminants in the Northeast Area. Contaminant concentrations currently found at depth in the Northeast Area are in the vicinity of MW-06. Given that future groundwater extraction wells are likely to be sited nearby, the Board believes it would be prudent to begin sampling these wells on a regular basis as soon as possible to establish a baseline dataset. This is especially relevant given the recent concerns expressed by WR Grace about the potential movement of contaminants due to pumping effects from future extraction wells, (Northeast Area Groundwater Pre-Design Results Report, May 5, 2008.)

The Board notes that the current report shows only passive diffusive bag, (PDB), sampling for MW-06D1 and MW-06D2 on 12/21/07. One of the limitations of PDB samplers is they have a history of underestimate concentrations of MTBE and 1,4-Dioxane. Given that MTBE was detected at both of these wells the Board requests that MW-06D1 and MW-06D2 be also sampled with conventional sampling methods.

The appropriateness of using the PDB sampling method needs continued evaluation at the W. R. Grace site. Monitoring wells with a history of using conventional methods should continue to be compared with the new PDB results. Since MW-06D1 and MW-06D2 are both new wells without an extensive sampling history there is no conventional dataset to compare to PDB data in order to assess whether or not the results are accurate for this sampling location. The Board believes that it is premature to base a decision to discontinue monitoring at these new wells based on the results of one monitoring round using a sampling method that is still under evaluation.

The Board requests that the detections of nickel at the WR Grace Site, especially in close proximity to the Acton Water District public drinking water wells be investigated. The relevant standard for nickel is 100ppb. Elevated levels of nickel have been detected in the past at monitoring well AR-29SBR, located very close to the Lawsbrook public well (360ppb in 2002; 214ppb in 2003; 272 in 2006; lower concentrations were detected in other years). The Lawsbrook well is located slightly to the northeast of AR-29SBR.

The Board notes that the 2007 Monitoring Program Report shows that 102 ppb of nickel was detected at monitoring well AR-31S. This well is located between the Lawsbrook and Scribner public well-fields. The Board is concerned that there appears to be an increasing trend in nickel concentrations in this well since 2002. The report notation of sampling issues as a potential cause of the high detection in 2007 fails to take into account the historical nickel concentrations.

The Board is extremely concerned about the late release of the 2007 Monitoring Program Report. A one year differential between the collection of samples and reporting of the results is not consistent with industry standards. It is difficult for the Board, AWD and ACES to have a full and timely understanding of the monitoring program when significant delays occur regarding the reporting of monitoring results.

The Board requests that the 2008 Monitoring Program Report and subsequent year reports be released earlier in the year to provide more time for the review of the previous year's results before the start of the next round of annual sampling. At a minimum the report from the previous year should be available by the end of the first quarter of the next year. This will allow sufficient time for review and any recommended changes before the next sampling round begins. With mailing time, the current report, dated July 31, 2008, was not available until August 2008. According to this July's Monthly Update for the site, the 2008 annual sampling round was due to begin in late August, or in September.

The Board thanks EPA and DEP for the opportunity to provide these comments on the Monitoring Plan Report, 2007.

Sincerely,

A handwritten signature in black ink, reading "Lauren A. Rosenzweig". The signature is written in a cursive, flowing style.

Lauren Rosenzweig  
Chairperson  
Acton Board of Selectmen

Cc: Mary Michelman, ACES  
Chris Allen, AWD  
Stephen Anderson, Anderson & Kreiger  
Jane Ceraso, AWD  
Doug Halley, Acton Health Director  
Steve Ledoux, Acton Town Manager  
Jim Okun, OT&O  
Brent Reagor, Concord Health Director  
Sarah White, USEPA